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PRACTICE LIMITED TO MATTERS BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION

MAILING ADDRESS:  
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September 16, 1993

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William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

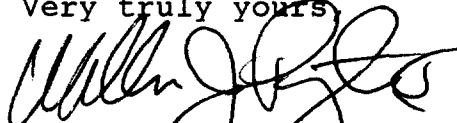
RE: MM Docket No. 93-214

Dear Mr. Caton:

Transmitted herewith, on behalf of Ocracoke Broadcasters, permittee of a new FM Broadcast Station at Ocracoke, North Carolina, is an original and four copies of its "Comments" in the above-captioned rule making proceeding.

Should you have any questions regarding this matter please do not hesitate to contact the undersigned.

Very truly yours,



William J. Pennington, III  
COUNSEL FOR OCRACOKE BROADCASTERS

Enc.  
WJP/tlt

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments )  
FM Broadcast Stations )  
(Ocracoke, North Carolina) )

MM Docket No 93-214  
RM-8287

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To: Chief, Allocations Branch

COMMENTS

Ocracoke Broadcasters ("OB"), permittee of a new FM Broadcast Station at Ocracoke, North Carolina, by its attorney, hereby submits its comments in the above captioned proceeding. These comments are submitted pursuant to Notice of Proposed Rule Making in MM Docket No. 93-214, released July 22, 1993. In support the following is stated:

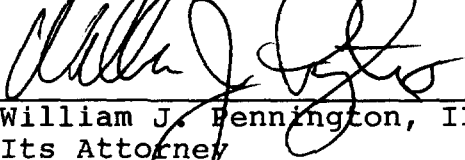
1. OB restates that if the Commission substitutes Channel 224C1 for Channel 225A at Ocracoke, that it will immediately file an application with the Commission seeking the facilities changes associated with the upgrade and, if granted a construction permit, will immediately construct the upgraded facility.

2. The proposed allotment of Channel 224C1 to Ocracoke is site restricted 50 kilometers southwest of Ocracoke in order to

meet the Commission mileage spacing requirements. The majority of the area between the allotment site and the community of Ocracoke is over Pamlico Sound. The community of Ocracoke is located on Ocracoke Island, which is part of North Carolina's Outer Banks. The allotment site is located on the mainland in Carteret County. The station, with Class C1 facilities, will place a 70 dBu service contour completely over the community of Ocracoke. Attached, as Exhibit 1, is an Engineering Statement and technical exhibits from Associated Radio Resources which show conclusively that the station will provide the complete community of license with 70 dBu service.

3. WHEREFORE, the above information being shown, Ocracoke Broadcasters respectfully requests that the Commission substitute Channel 224C1 for Channel 225A at Ocracoke, North Carolina and modify its construction permit on Channel 225A to specify operation on Channel 224C1.

Respectfully submitted,  
**OCRACOE BROADCASTERS**

  
\_\_\_\_\_  
William J. Pennington, III  
Its Attorney

Post Office Box 2506  
Pawleys Island, SC 29585  
(803) 237-2591

September 16, 1993

EXHIBIT 1



**ASSOCIATED RADIO RESOURCES, INC.**  
**ENGINEERING, PROGRAMMING & MANAGEMENT CONSULTANTS**

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**TECHNICAL NARRATIVE AND EXHIBITS**

**COMMENTS OF**

**OCRACOE BROADCASTERS**

**MM Docket No. 93-214**

**OCRACOE, NORTH CAROLINA**

**PREPARED September 14, 1993**

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**CERTIFICATION**

I, Gregory P. Bunce, do hereby certify;

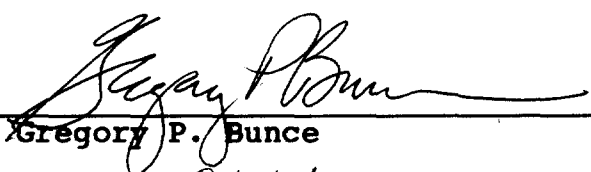
That my qualifications in telecommunications matters are of record before the Federal Communications Commission having been presented and accepted upon many occasions in the past;

That I am a consultant in technical topics pertaining to the broadcast industry and the associated RF transmission systems;

That I have been retained by Ocracoke Broadcasters to perform certain technical studies and prepare this report of same;

That the accompanying technical report and exhibits were prepared by me personally or under my immediate personal supervision and that all information presented therein is true and correct to my knowledge and belief.

/s/

  
Gregory P. Bunce

Date

9/14/93

## **OCRACOCKE BROADCASTERS**

### **INTRODUCTION**

The following engineering statement, attached data and exhibits supply information requested by the Commission in support of the Petition For Rule Making (RM-8287) filed by Ocracoke Broadcasters ("OB") in MM Docket No. 93-214. OB seeks the substitution of Channel 224C1 for Channel 225A at Ocracoke, North Carolina, and the concurrent modification of its Construction Permit to specify operation on the new channel and class. As per the Notice of Proposed Rule Making, this report shows conclusively that an FM broadcast station operating at maximum facilites on Channel 224C1 at the reference point requested by OB would in fact place the requisite 70 dBu (3.16 mV/m) contour completely over the city of license.

### **DISCUSSION**

The reference site of the proposed facility is located at the following North American Datum 1927 ("NAD-27") geographic coordinates:

34°51'15" N / 76°24'58" W

The approximate center of the community of license, as obtained by interpolation, using the Ocracoke Quadrangle 7.5 Minute Series Topographic Map is identified by the following NAD-27 geographic coordinates:

35°06'47" N / 75°58'46" W

Due to the community's unique geographic relationship to the Cape Hatteras National Seashore boundaries, the community is restricted to a small area of land not included



## OCRACOKE BROADCASTERS

in the National Seashore. The National Seashore boundary farthest away from the reference site can be described by the following NAD-27 coordinates:

35°06'44" N / 75°57'34" W

The following table indicates the distance and bearing from the proposed reference site to the center of Ocracoke and to the distant non-federal land reference point, as noted above:

Proposed Site To:	Latitude Longitude	Distance (km/mi)	Br To (deg) Br Fr (deg)
Approximate Center of Ocracoke, NC	35-06-47 N 75-58-46 W	49.13 km 30.53 mi	54.23° 234.23°
Farthest point of Non-Federal Land	35-06-44 N 75-57-34 W	50.56 km 31.43 mi	55.53° 235.53°

Exhibit A contains a portion of the Ocracoke Quadrangle 7.5 Minute Series Topographic Map, showing the vicinity around the community of license, noting the approximate center of the community and the Cape Hatteras National Seashore boundaries. Exhibit B contains a map featuring portions of the Rocky Mount, Beaufort and Manteo 1:250,000 USGS Topographic maps plainly showing the community of license of the proposed facility and the proposed allocation reference point for Channel 224C1.

Through these maps and the above Table, it can be readily determined that the 70 dBu contour of Channel 224C1 at Ocracoke, North Carolina, operating with maximum facilities (50.2 km) from the proposed reference site, will completely encompass the community of license.

## **OCRACOCKE BROADCASTERS**

### **CONCLUSION**

Based on the accompanying technical information, we trust that this proposal complies with the requirements set forth in the Commission's Rules and Regulations. If any additional information is requested, please do not hesitate to contact this office.

OCRACOKE QUADRANGLE  
NORTH CAROLINA-HYDE CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

EXHIBIT A  
Ocracoke, NC

